



*EPA expressed envir. concerns. as asked NPS  
to provide additional info on water qual. erosion  
control, hazardous materials, construction activities.*

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

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EC-2*

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

September 27, 1996

Stanley T. Albright  
Regional Director  
Western Regional Office  
National Park Service  
600 Harrison St., Suite 600  
San Francisco, CA 94107-1375

Dear Mr. Albright:

The Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan & Environmental Impact Statement (DEIS) for the San Francisco Maritime National Historic Park, San Francisco County, California. We are submitting the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations implementing NEPA (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

In proposing the management plan, the National Park Service (NPS) examined three alternatives, including a "no action". The alternatives address management policies for natural, historic, and cultural resources, and plans for visitor use facilities, and interpretive sites. Alternatives A and B would entail upgrades of the Victorian Park setting, Hyde Street Pier, and movement of exhibits and facilities from the Aquatic Park bathhouse to the Haslett warehouse, construction of additional interpretive sites and visitor structures. The preferred alternative describes a program of preservation and enhancement of the historic and cultural resources in order to expand visitor uses.

We are concerned with several aspects of the DEIS. Namely that there is not a complete discussion in the DEIS regarding the impacts to water quality from construction activities and potential stormwater runoff from the facilities in the park in keeping with the requirements of the National Pollution Discharge Elimination System, or cumulative impacts to localized air quality in keeping with the Clean Air Act. The DEIS does not discuss the disposition, maintenance, and storage of materials (solvents, petroleum products, paints) used in the restoration of the historic ships and also if there would be herbicide and pesticide treatments on the ships, piers, and in Aquatic park. While the impacts associated with these issues may prove to be substantively insignificant, they should nevertheless be addressed and evaluated in the document.



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We believe that more detailed information should be included in the Final EIS such as guidelines and procedures regarding: construction activities, runoff; erosion control; air quality; hazardous materials; pathway and landscape management; land use inside and outside the Monument; cumulative impacts; and the related specific mitigation measures. Our review comments, which are attached, discuss these concerns in greater detail.

Based on our review and the aforementioned issues we have assigned a rating of EC-2 (Environmental Concerns --Insufficient Information; see attached rating sheet) to the DEIS.

We appreciate the opportunity to review your DEIS. Please send two copies of the Final EIS to this office when the document is officially submitted to EPA Headquarters. If you have any questions, please call me at 415-744-1584, or contact David J. Carlson at 415-744-1577.

Yours truly,

*David Farrel*

for David Farrel, Chief  
Office of Federal Activities

Attachments (2)

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## General Comments

The DEIS does not mention whether or not specific design and management issues which are not covered in this document will be addressed in future detailed plans and studies. A programmatic-level EIS, such as a General Management Plan, should provide a framework for more detailed plans and studies including mitigation measures to minimize the impacts from the implementation of the various parts of the project. Discussions of future plans and NEPA documentation in the FEIS should cover the Haslett warehouse, the final disposition of the Wapama, and the final design of the Sea Scout base.

We suggest that the FEIS discuss any foreseeable changes (in existing site design and location plans) that could either affect the priorities identified in the DEIS or introduce significant new resource management issues. The FEIS should explain how the NPS would monitor impacts from these projects to ensure consistent management techniques are applied throughout the Historic Park.

Also, the DEIS is very vague in its discussion of the different development portions of the proposed alternatives, such as the removal and then construction of the Maritime bookstore, other potential uses for the Aquatic Park bathhouse, landscaping and relandscaping certain areas, and development of the plaza area at Hyde and Jefferson Streets and near the cable car turnaround. The FEIS would benefit from greater detail regarding the specific actions planned for these facilities, (restoration and/or construction), and the intended direction and uses for these areas.

### Carrying capacity

The DEIS discusses the Historic Park's carrying capacity but does not provide a context for the numbers of visitors in relation to what the park's resources can support. The impression in the DEIS is that the park is underutilized and that the alternatives address methods and designs to encourage greater visitation. Also, there appears to be a shift in the visitation patterns away from the pier to the museum but the DEIS does not clearly discuss what may have caused the shift other than to say the entrance to the pier is less inviting. The FEIS should discuss what the ultimate goal of the NPS is, as far as visitation is concerned with the implementation of either alternative A or B. The FEIS should also discuss how the increase in people visiting the park and using the resources impact those cultural and natural resources.



## Water Resources

In January 1993, EPA and the National Oceanic and Atmospheric Administration jointly announced the availability of the Guidance for Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters (Guidance) pursuant to Section 6217(g) of the Coastal Zone Reauthorization Amendments of 1990. We recommend that the NPS consider this Guidance for the construction and development projects in the Historic Park and management of those areas. These guidelines should be referenced in the FEIS discussion of mitigating the construction impacts, as well as the discussion of implementing the guidelines along the roadway, parking areas, re-landscaped areas, and associated facilities when construction is completed.

Section 6217(g)(5) defines management measures as, "economically achievable measures for the control of the addition of pollutants from existing and new categories and classes of nonpoint sources of pollution, which reflect the greatest degree of pollutant reduction achievable through the application of best available nonpoint pollution control practices, technologies, processes, siting criteria, operating methods, or other alternatives."

### National Pollution Discharge Elimination System (NPDES)

The DEIS does not contain a discussion of the impacts related to the removal of the maritime bookstore from the Hyde Street Pier and the creation of a new bookstore building in Victorian Park and the changes to the plaza area northwest of the cable car turnaround and repaving of the forepier area (Hyde and Jefferson Streets). We are concerned that serious erosion impacts may occur due to the construction and maintenance of the road/stair/trail and new plaza system proposed for the area. We are concerned the NPS does not offer an erosion control plan to be implemented within the site. The document does not indicate the expected extent of erosion impacts due to development and land disturbances at the Historic Park. Since we could not ascertain the extent of surface land disturbance, we are concerned that the activities described in the DEIS could trigger the NPDES permitting requirements.

According to the requirements in 40 CFR section 122.26 (b)(14)(x), if the cumulative amount of disturbed land from the proposed actions within any of the alternatives will be greater than five acres, then all of the actions would be subject to the General NPDES permit for Discharge of Storm water runoff associated with construction activities, California permit



#CAS000002. If the NPS determines a permit will be necessary, the NPS should contact the State Water Resources Control Board (SWRCB) at 901 "P" Street, P.O. Box 100, Sacramento, CA, to obtain a copy of the permit and the Notice of Intent (NOI). The NPS must complete and file the NOI and must develop and implement a storm water pollution prevention plan containing Best Management Practices prior to commencing any construction.

If the proposed actions would impact less than five acres the local Regional Water Quality Control Board may still require that the actions be subject to the General NPDES permit. In this situation, we recommend that the NPS consult with the local Regional Water Quality Control Board.

We recommend that the NPS place a preliminary erosion control plan in the Final EIS as the reference for future environmental documents. We are including, as attachment A, an outline of erosion control management practices for guidance on methods that can be used to minimize erosion from road and building construction projects. Also, the NPS should identify, in the FEIS, the amount of land that would be disturbed by the development activities proposed in all of the alternatives and discuss the applicability of 40 CFR 122.26 (b)(14)(x) and the California General Permit # CAS000002. The FEIS should also describe the process the NPS intends to use to adhere to the NPDES permitting requirements, if they are applicable.

#### **Coastal Zone Management Act**

The Coastal Zone Management Act (CZMA) requires that Federal Agencies be consistent with the policies of state coastal zone management programs when conducting activities which affect a coastal zone. The Federal Agency must review the state Coastal Zone Management Plan (CZMP) to determine whether the activity would be consistent with the Plan and then notify the State of its determination. Federal agencies must prepare a written consistency determination which includes: a detailed description of the action, its associative facilities, and coastal zone effects; a brief statement on how the activity would be consistent with the state CZMP; and, data to support the consistency determination. The FEIS should indicate whether the NPS has been in consultation with the BCDC regarding the consistency of the alternatives with the Coastal Zone Management Plan.



## **Hazardous Materials**

The DEIS does not contain a discussion of the use, disposition, storage, and removal of hazardous substances that are used for the restoration and maintenance of the historic ships and pier. Also, the DEIS does not discuss the use of herbicides and pesticides in and around the park either on the grounds or on the pier. The NPS should identify in the FEIS that the provisions of the Resource Conservation and Recovery Act (RCRA) and associated state hazardous waste disposal requirements have been considered and implemented as part of the Management Plan, and further disclose how the NPS proposes to handle and treat any hazardous materials. We strongly recommend that the FEIS discuss the use, storage, and disposition of solvents, paints, petroleum products or any other materials that could be classified as a hazardous waste under Federal or California State regulations.

The NPS should discuss the measures in place to either eliminate or minimize impacts from a possible release of any of these materials into the environment, particularly a release that may impact bay water quality and aquatic life.

We recommend that the FEIS describe in detail the procedures that NPS will follow in order to meet the requirements. The FEIS should identify: 1) that the NPS or their contractor may become a hazardous waste generator; 2) that a generator identification number must be obtained in order to transport hazardous materials; and, 3) the procedures that would be used to comply with the land ban requirements for handling and disposing of hazardous waste. The FEIS should also disclose whether the NPS has met all OSHA regulations regarding health and safety and handling of hazardous waste.

## **Air Quality**

### **Cumulative Impacts**

The FEIS should address cumulative air quality impacts, including direct and indirect emissions associated with the project plus emissions associated with other future development, such as the Port of San Francisco's plans for the areas adjacent and in the vicinity of the Park. Future scenarios should be carefully specified using the most recent estimates of population, employment, travel, and congestion approved by the relevant Planning Agency.

## Pollution Prevention

Pursuant to Public Law 010-508, Pollution Prevention Act of 1990 (PPA), "It is the policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible, and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner." The FEIS should describe how the NPS would implement programs and practices to insure that the project would comply with the PPA.



### Attachment A

#### **Erosion**

1. Schedule projects so clearing and grading is done during times of minimum erosion potential.
2. Mark and clear off only areas essential for construction.
3. Avoid disturbing vegetation on steep slopes or other critical areas such as highly erodible soils and areas that drain directly into sensitive water bodies.
4. Route construction to avoid existing and newly planted vegetation.
5. Protect natural vegetation with fencing, tree armoring.
6. Cover or stabilize topsoil stockpiles.
7. Use wind erosion controls to act as wind barriers such as solid board fences, snow fences and bales of hay.
8. Seed and mulch disturbed areas.

#### **Siting Roadways and Bridges**

1. Consider the type and location of permanent erosion and sediment controls such as vegetative buffer strips, grass swales, energy dissipators and velocity controls.
2. Avoid marshes, bogs and other low-lying lands subject to flooding.
3. Avoid locations requiring excessive cut and fill.
4. Avoid locations subject to subsidence, land slides, rock outcroppings and highly erodible soils.
5. Size right-of-ways to include space for siting runoff pollution control structures, as appropriate.
6. Avoid locations requiring numerous river crossings.
7. Direct pollutant loadings away from bridge decks by diverting runoff waters to land for treatment.